

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**OMER KUZU,**

**Defendant.**

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**CRIMINAL ACTION NO.**

**3:19-CR-00327-M**

**ECF**

**UNOPPOSED MOTION FOR CONTINUANCE OF SENTENCING  
AND CORRESPONDING CONTINUANCE OF THE  
DEADLINE FOR SENTENCING MOTIONS**

TO THE HONORABLE CHIEF JUDGE BARBARA M.G. LYNN:

Defendant Omer Kuzu (“Mr. Kuzu”) respectfully moves this Court for a continuance of sentencing and a corresponding continuance of the deadline for sentencing motions and, in support, presents the following:

1. According to this Court's Scheduling Order for Sentencing, Mr. Kuzu is scheduled for sentencing on January 21, 2021. Written objections to the PSR were due on December 9, 2020. Any downward departure and/or variance motion are due January 15, 2021.
2. The defense requests that the Court reset sentencing in this case until at least June 2021. First, defense counsel has been unable to meet with Mr. Kuzu in any significant way to discuss the findings in the presentence report. As the Court is aware FDC Seagoville is currently under lockdown due to a reemergence of the COVID virus at the facility. As a result, counsel has had significant difficulty in attempting to arrange an appointment with Mr. Kuzu to discuss the PSR. In addition, Mr. Kuzu’s testimony might prove necessary in an unrelated matter and, if so, would be important for the Court to consider at the time of Mr. Kuzu’s

sentencing.

3. Defense counsel has discussed this motion with the Assistant United States Attorney assigned the case, Ms. Errin Martin, and learned that the government is not opposed to this motion.

Respectfully submitted,

/s/ Jason D. Hawkins  
Jason D. Hawkins  
Federal Public Defender  
Texas Bar No. 00795763  
525 Griffin, Suite 629  
Dallas, TX 75202  
(214) 767-2746  
(214) 767-2886 Fax  
Attorney for Omer Kuzu

**CERTIFICATE OF CONFERENCE**

I, Jason D. Hawkins, hereby certify that I conferred with Errin Martin, AUSA on the above-referenced motion, and learned that the government does not oppose this request for a continuance of sentencing.

/s/ Jason D. Hawkins  
Jason D. Hawkins

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2020, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this notice as service of this document by electronic means: Assistant U. S. Attorney Errin Martin at Errin.Martin@usdoj.gov.

/s/ Jason D. Hawkins  
Jason D. Hawkins